



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

March 15, 2017

**BY ECF**

The Hon. William H. Pauley III  
United States District Judge  
500 Pearl Street  
New York, NY 10007

**Re: In re Various Grand Jury Subpoenas, 12 Misc. 381 (WHP)**

Dear Judge Pauley:

The Government writes to request a two-week extension of the briefing and argument schedule in this case, as well as the date on which sanctions begin to accrue against Subject E in order to accommodate any extended briefing and argument schedule.

A number of responsive documents have been provided to the Government, some directly by Subject E's counsel, and some by foreign financial institutions. The Government is still in the process of reviewing these records to determine their completeness, but has identified some documents that appear to be missing and has alerted Subject E's counsel to that fact. The two-week extension would allow the Government to continue its review of the produced documents, and raise any issues with Subject E's counsel to allow the parties to confer before raising any issues with the Court. Additionally, the undersigned counsel will be out of the country on vacation from March 16 through March 23, 2017.

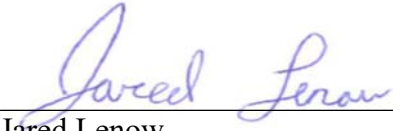
On the proposed timetable, Subject's E's motion would be due March 29, with the

Government's response due March 30, and any argument scheduled for the following day (or whenever is most convenient for the Court). Subject E's counsel consents to this proposal.

Respectfully submitted,

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